

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
)
THARON BRADLEY) NO.: 18-16173
)
Debtor,) CHAPTER 13
)
) JUDGE: A. BENJAMIN GOLDGAR

**NATIONSTAR MORTGAGE LLC d/b/a MR. COOPER'S NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE EXTENSION DUE TO THE COVID-19 PANDEMIC**

NOW COMES Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by and through undersigned counsel and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance due to a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of six months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting May 01, 2020 through October 01, 2020. Creditor holds a secured interest in real property commonly known as 4600 Blarney Dr., Matteson, IL 60443 as evidenced by claim number 3-1 on the Court's claims register. Debtor has requested to extend their forbearance period to include the mortgage payments from November 1, 2020 through January 1, 2021. At this time, Creditor does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume mortgage payments beginning February 01, 2020 and will be required to cure the delinquency created by the forbearance period (hereinafter

“forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

By: /s/Dana O'Brien

Dana O'Brien
ARDC #6256415
Counsel for Creditor
McCalla Raymer Leibert Pierce, LLC
1 N. Dearborn Suite 1200
Chicago, IL 60602

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for*

Forbearance was served upon the following parties in the following fashion on May 13, 2021:

To Debtor:
4600 Blarney Dr.
Matteson, IL 60443
By U.S. Mail

To Attorney:
Patrick Semrad
The Semrad Law Firm, LLC
20 S. Clark St., 28th Floor
Chicago, IL 60603
By Electronic Notice through ECF

To Trustee:
Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604
By Electronic Notice through ECF

U.S. Trustee
Patrick S. Layng
Office of the U.S. Trustee, Region 11
219 S. Dearborn St.
Room 873
Chicago, IL 60604
By Electronic Notice through ECF

/s/Dana O'Brien

Dana O'Brien

Counsel for Creditor